

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re:)	Chapter 11
)	
FIRSTENERGY SOLUTIONS CORP., <i>et al.</i> ,)	Case No. 18-50757 (AMK)
)	(Jointly Administered)
)	
)	Hon. Judge Alan M. Koschik
)	

**NOTICE OF APPEARANCE AND REQUEST
FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Joyce Goldstein and Goldstein Gragel LLC hereby enter their appearance in the above-captioned bankruptcy case as counsel for International Brotherhood of Electrical Workers Local 272, AFL-CIO (“Local 272”) and request pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure and sections 102(1) and 1109(b) of title 11 of the United States Code, that all notices given or required to be given in connection with this case and all papers served or required to be served in this case or in any adversary proceeding arising in or related to this case, be given and served upon:

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PLEASE TAKE FURTHER NOTICE that this request includes not only the orders, notices, pleadings, and other papers referred to in the Bankruptcy Rules but also, without limitation, all orders and notices of any application, motion, petition, objection, request, complaint or demand, whether formal or informal, written or oral, or whether transmitted or

conveyed by mail, courier, hand delivery, facsimile transmission, electronic mail, telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interests of or in (a) the Debtor, (b) the property of the Debtor, (c) property of the Debtor's estate, (d) proceeds of any of the foregoing or (e) property in the possession or control of the Debtor or (2) requires or seeks to require any delivery of property, payment or any other act or conduct by Local 272.

This request under Bankruptcy Rule 2002 is not and may not be deemed or construed to be a waiver of any of Local 272's substantive or procedural rights, including without limitation (a) any right to require that where any adversary proceeding is initiated against Local 272 in this or any related case or where any proceeding is initiated by complaint against Local 272 in accordance with the applicable Bankruptcy Rules, the Federal Rules of Civil Procedure, and applicable non-bankruptcy law that service upon the undersigned counsel is insufficient for such purposes; (b) any right to have any final order in a non-core matter entered only after *de novo* review by the United States District Court; (c) any right to trial by jury in any proceeding so triable in this case or in any case, controversy or proceeding related to this case; (d) any right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (e) any other right, claim, action, defense, setoff or recoupment to which Local 272 is or may be entitled under any agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs or recoupments Local 272 expressly reserves.

Dated: April 9, 2018

Respectfully submitted,

GOLDSTEIN GRAGEL LLC

/s/ Joyce Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2018 a true and correct copy of the foregoing Notice of Appearance was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties on the Electronic Mail Notice List. Parties may access this filing through the Court's system.

/s/ Joyce Goldstein

Attorney for International Brotherhood of Electrical Workers, Local 272, AFL-CIO